Exhibit 91

PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION TO EXCLUDE GENERAL CAUSATION TESTIMONY OF PLAINTIFFS' EXPERTS

Case No.: 4:22-md-03047-YGR MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

Arturo Conversion (Internal version)

SOW Version (Julianna)

We are asking Arturo for several deliverables towards Instagram Well-being's mission to create safe, supportive, and equitable experiences that foster trust in Instagram. In no particular order:

A summary of insights from Arturo's experience as to what data we need to collect, from whom, in what formats, in order to understand what makes Instagram users have bad experiences on the platform, whether they violate our Community Guidelines / Standards, or not. This is a quarterly deliverable for ongoing insights.

Survey designs (likely 5 or so needed for different flows within the app), produced together with Instagram user research, product design, and content design teammates, to collect the aforementioned data.

Provide consulting to IG Well-being, Central Integrity and other internal XFN partners regarding the collection of data. We need to vet and socialize of these methods with IG Well-being and our partners, e.g. Central Integrity and Central Social Impact, to get their buy-in to collecting this data, as well as their feedback on insights, on an ongoing

Consult and advise Engineering leadership teams within Instagram regarding data collection and analytics in support of data pipeline and dashboard design for ongoing monitoring, alerting, and roadmap changes.

Provide three monthly summaries of insights and recommendations for product roadmap prioritization across Instagram (including outside of Well-being) to improve bad experiences as seen by our users.

Improve, iterate or create career growth plans for FB leadership (senior eng, product, data science, design, user research) working on these projects, to identified FB managers.

Draft and socialize a vision for Instagram to move away from policy-violating focus towards bad experience measurement and improvement, updated every six month based on new data and insights from the teams involved.

Every six months, draft a set of headline metrics for Instagram to use in defining, measuring, and improving bad experiences. Final draft each half to be consulted, reviewed and approved by FB data scientists.

Payment Structure

How do we envision paying for Arturo's services?

- · We are flexible, with monthly being ideal.
- We can put dollar values on deliverables, yes. But I am going on parental leave, so maybe Samir can take a swag at

We will not be able to pay hourly moving forward

Job Description (Prior to chatting with Julianna)

The Instagram Well-being organization is looking for a world-class leader with both breadth and depth in a number of areas, all aimed towards our collective vision of making Instagram a force for good in this world.

The pillar's mission is to make Instagram the safest and most supportive community. This person would ideally cover the entire funnel, starting with understanding (What are people experiencing on Instagram? How are they feeling about it?), to product planning (What should we prioritize improving? How?), to engineering advice (system architecture, design, working with shared infrastructure across the company), to rollout communications (working with PMM, Comms, and business functions as needed).

This leader should have in-depth experience in understanding user bad experiences (qualitatively and quantitatively), translating it to product ideas with the relevant XFN experts, and designing long-term, cross-Instagram (and cross-family of apps, potentially cross-industry) technical architectures to support users as they experience these bad moments. We would expect this person to be a thought-leader in the space, with considerable (10+ years) experience with online harm understanding, measurement, and remediation.

The role including undertaking short- and long-term (multi-year) projects within Instagram, across the family of apps (e.g. messaging bad experiences with Messenger / IG Direct / WhatsApp), and ideally across the industry in time, where we want to collaborate with other leading social platforms such as YouTube, Twitter, and TikTok.



This person should represent Instagram in these forums, requiring a high degree of clear communication (verbal and written) on nuanced topics (such as understanding teenage bullying on the platform).

Finally, we would hope this leader helps coach and grow our personnel, again across functions (especially engineering, product, research, and data science), so they have the skills to help with all of the above topics over time.

Responsibilities

- Work with the Well-being research team to lead Instagram's efforts to understand bad experiences on our
 platform; what are users experiencing, how do they perceive it? Help design user surveys, interviews, and other
 research methods, participating directly as needed.
- Work with the Well-being data science team to translate those understand efforts into concrete metrics, both
 goaling and operational, we can use to guide our strategy. Conduct qualitative and quantitative analysis of the data
 involved.
- Influence resource allocation across functions, across the company, so we focus on the most impactful ways to be a
 force for good in the world. Drive analysis and decisions on (eg) reducing prevalence of policy-violating issues vs
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- Work with the Well-being product teams to translate the above into roadmaps, at each half planning cycle, emphasizing a long (multi-year) view.
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- Be a bridge to other teams in the family of apps, e.g. Facebook App Integrity or the central Responsible Innovation group. Represent Instagram in meetings with those teams, seek alignment on common goals and metrics.
- Represent Instagram's work in this area to our management chains, e.g. IG Leads, Central Integrity, Central
 Customer Support, and related groups, up to and including Facebook executive team members.

Requirements

- · Proven experience in the field
- · Experience in management
- · Analytical and creative
- · A great listener with ability to communicate with people of diverse disciplines
- · 20+ years of industry experience

Business Justification

The combination of responsibilities describes above is quite rare: it's world-class expertise in user understanding (research), the ability to translate it into a product roadmap, as well as an engineering plan, all in a highly-specialized space (Well-being). There are fewer than 10 people in the world meeting these qualifications, we estimate, most of whom are retired or employed at our competitors.

Arturo would bring industry-leading expertise to bear on a high-priority space, with positive impact on the daily lives of 1B+ users on Instagram, leading to improved brand sentiment and regulatory adherence. If he joins, he can work for us exclusively, bringing a significant competitive advantage. He is regularly courted by Twitter, Google, TikTok, and similar competitors.

As soon as Chris Cox came back to Facebook, he and Arturo got back in touch. That's the level of expertise Arturo brings, and we hope to retain him as a Facebook asset for the years to come, in the maximum capacity he can.

Please note we will continue efforts to get him to full-time as much as possible. The current blocker is not interest, but his ongoing partnership writing and composing an opera with partnership writing and composing an op

Arutro Conversation

Page 4 of 13

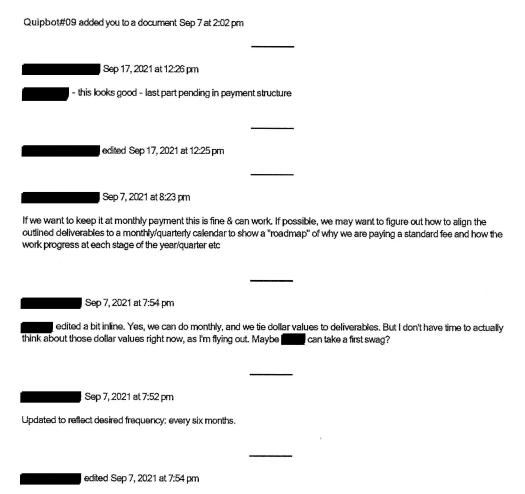
P1389.3

- . How many hours a week do you think you'd be available?
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- We need to put together a JD, with roles/responsibilities. Is that something you can start, and we can iterate on in quip/Google docs?
 - o Added a section below for that, made it HR friendly, feel free to annotate or feedback.
- · What type of payr ate are you thinking of?
 - Great question, we might need to do a quick video chat on this one at my corporate consulting rate 500, 12 hours week/4 weeks month/12 months it adds up to \$312k.
 - I think 200k + benefits would work. Maybe I'm thinking low? I think FB gets a lot of bang for the buck in terms of the things I bring.
- In terms of reporting structure, are you ok with reporting to Yoav?
 - o Yep, I think he's great.

Contact Support

Conversation History

Odif Cisation instally
Quipbot#09 left the thread Sep 7 at 2:09 pm
Quipbot#09 Sep 7 at 2:03 pm
=====!MPORTANT=====
This Quip file has been copied to Google Workspace (https://docs.google.com/document) as part of the Quip2Google migration efforts. Quip is moving to Read-Only, Please work in the new Google file moving forward.
Learn more
https://fb.workplace.com/groups
Questions?
Visit the Quip2Google Migration Feedback Group (https://fb.workplace.com/groups).
Note
New edits in this Quip file will NOT be automatically synced to Google Workspace.
Quipbot#09 added Quipbot#09 to the thread Sep 7 at 2:08 pm



A summary of insights from Arturo's experience as to what data we need to collect, from whom, in what formats, in order...

Social Impact, to get their buy-in to collecting this data, as well as their feedback on insights, on an ongoing basis.

Engineering supervision and direction, to the engineers within IG Well-being who will be building out the data collection, as well as the analytics teammates generating the insights from the data. Data pipeline design, data dashboard design.

At least three monthly summaries of the insights we have and recommendations for product roadmap prioritization across Instagram (including outside Well-being) to improve bad experiences as seen by our users.

Help improve and iterate, or create where needed, career growth plans for the leadership (senior eng, product, data science, design, user research) working on these projects, together with their managers.

Consult and advise Engineering leadership teams within Instagram regarding data collection and analytics in support of data pipeline and dashboard design for ongoing monitoring, alerting, and roadmap changes.

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- · We are flexible, with monthly being ideal.
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Can we set up a monthly or quarterly payment structure? Do we tie payment to the above services - ie: each call out is worth X amount of \$? Sep 7, 2021 at 6:18 pm - to confirm Sep 7, 2021 at 6:15 pm Same as above, how many times would Arturo draft these? 1x per year or half? (will need a number in terms of how often to expect delivery) Recommend revising to: "Draft as set of headline metrics for IG to use in defining, measuring and improving bad experiences. Final draft to be consulted, reviewed and approved by FB data scientists." Sep 7, 2021 at 6:12 pm Will this be 1 vision per quarter? (need to identify quantity or if this is a 1 time delivery) We can say after XX meeting draft and present a vision for Instagram to move away.... etc Sep 7, 2021 at 6:10 pm Recommend changing to: "Improve, iterate or create career growth plans for FB leadership (senior eng. product, data science, design, user research) working on these projects, to identified FB managers." edited Sep 7, 2021 at 6:18 pm Payment Structure How do we envision paying for Arturo's services? Can we set up a monthly or quarterly payment structure? Do we tie payment to the above services - ie: each call out is worth X amount of \$? *We will not be able to pay hourly moving forward* Sep 7, 2021 at 6:09 pm Recommend to change to: "Provide three monthly summaries of insights and recommendations for product roadmap prioritization across Instagram (including outside of Well-being) to improve bad experiences as seen by our users" Sep 7, 2021 at 6:08 pm Aye aye, that is accurate. Editing with that.

edited Sep 7, 2021 at 6:09 pm

Page 7 of 13

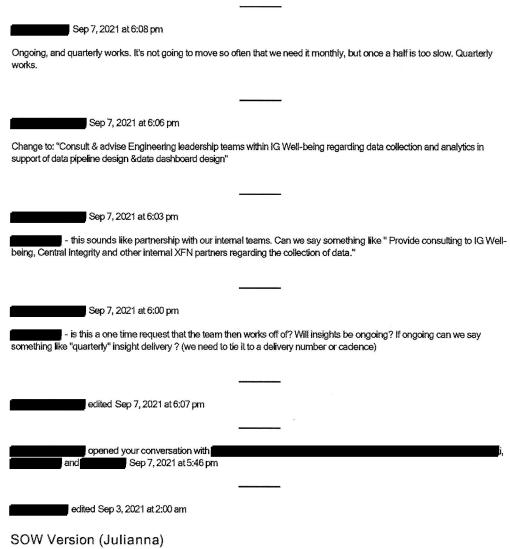
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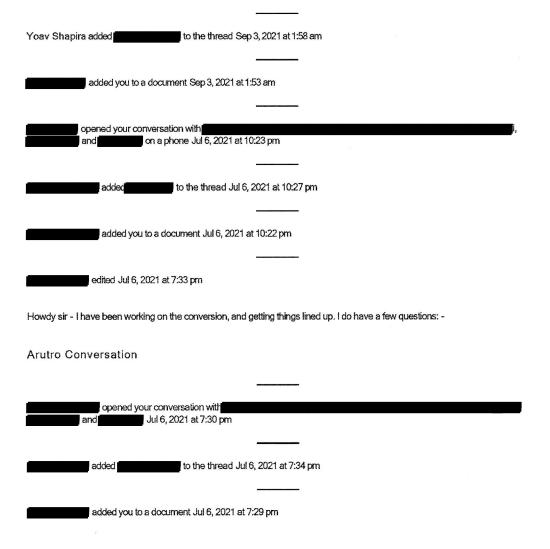
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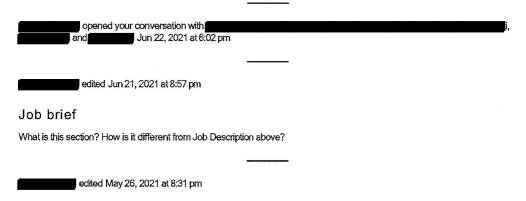
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May 14, 2021 at 8:05 pm emailing you right now:)

edited May 14, 2021 at 8:05 pm

The Instagram Well-being organization is looking for a world-dass leader with both breadth and depth in a number of areas, all aimed towards our collective vision of making Instagram a force for good in this world.

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- . Undertaking short-term or long-term projects within Instagram and across Facebook to help with areas of Wellbeing, Account Safety, and Integrity.
- . Meeting with management or appropriate staff to understand their requirements
- · Provide mentoring and feedback on the areas of: general management, engineering management, well-being, integrity, and account safety.

What is this section? How is it different from Job Description above?

Industry expert in the areas of: Well-being, Customer Care, Integrity, and Security for Social Media. Responsible for reviewing and supporting initiatives in these areas. Will support development of measurement strategies, user research, data analytics, and product features in these areas.

Will also provide mentoring on subject matter, management, and professional relationships to individuals working on these

The role is to support Instagram on its goal of fostering a safe and supportive community.

- . Undertake short-term or long-term projects to address a variety of issues and needs
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- Conduct situational
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- Present and explain findings to appropriate executives
- · Provide advice or suggestions for improvement according to objectives
- · Formulate plans to implement recommendations and overcome objections
- · Help drive awareness of initiatives across different business units

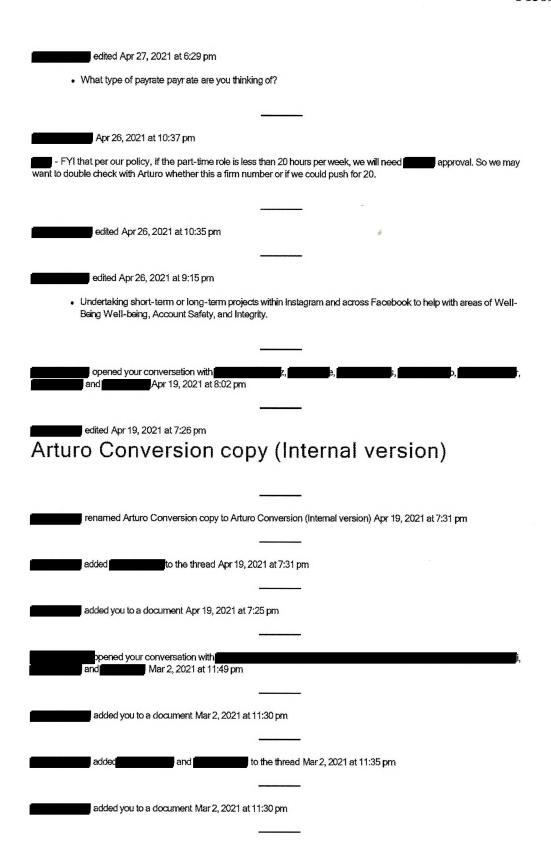
May 14, 2021 at 7:47 pm

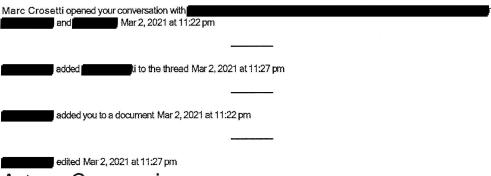
Hey just wanted to follow up on the above point. We can definitely follow the approval flow for a sub-20hr/week parttime role but just wanted to make sure that's still the right information before I get that ball rolling. Thanks!

edited May 5, 2021 at 9:49 pm

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Arturo Conversion copy

Howdy sir - I have been working on the conversion, and getting things lined up. I do have a few questions: -

- · How many hours a week do you think you'd be available?
 - o Right now I'm thinking 12, around a day and a half. Considering remote work which helps so much for use of time. My thinking is that it would be on average, some weeks more, some weeks less, depending on demand. This would allow me to work hands on a few projects projects, provide mentoring/support to 3-4 people, as well as advocate/liaise with different parts of the organization (having the bandwitdh/perspective to work with the FB App team, or RI has been great).
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 - Yep, I think he's great.

Job Description

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- · Meeting with management or appropriate staff to understand their requirements
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Job brief

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Will also provide mentoring on subject matter, management, and professional relationships to individuals working on these ares.

The role is to support Instagram on its goal of fostering a safe and supportive community.

Responsibilities

- Undertake short-term or long-term projects to address a variety of issues and needs
- · Meet with management or appropriate staff to understand their requirements
- · Conduct situational and data analysis to identify and understand a problem or issue
- · Present and explain findings to appropriate executives
- · Provide advice or suggestions for improvement according to objectives
- . Formulate plans to implement recommendations and overcome objections
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Requirements

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created the document Mar 2, 2021 at 11:27 pm